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5
6 UNITED STATES DISTRICT COURT

7
DISTRICT OF NEVADA

8 DAC PROPERTIES LLC dba THE
 9 KOSMOS COMPANY, a Nevada
 limited liability company,

10 Plaintiff,

11 v.

12 USG NEVADA LLC, a Delaware
 13 limited liability company,

14 Defendant.

Case No.: 3:24-cv-00508-MMD-CSD

**STIPULATION TO EXTEND TIME TO
 RESPOND TO COMPLAINT**

(FIRST REQUEST)

15
 Pursuant to Local Rules IA 6-1 and 7-1, Plaintiff DAC Properties LLC dba The
 16 Kosmos Company (“Kosmos”) and Defendant USG Nevada LLC (“USG”) hereby
 17 stipulate, agree, and respectfully request that the Court extend the deadline for USG to
 18 respond to the operative Complaint from January 21, 2025 to February 28, 2025.¹
 19

20 The Amended Complaint was filed on November 15, 2024 (ECF No. 6) and
 21 Kosmos sent USG the waiver of service on November 19, 2024, which USG signed and
 22 returned (ECF No. 15). As such, USG’s deadline to respond or otherwise answer the
 23 Complaint is currently January 21, 2025. The parties have agreed and respectfully
 24

25 _____
 26 ¹ This Stipulation should not be construed as, nor shall it constitute, a waiver of any rights
 27 and remedies of USG or its directors, officers, employees, agents, representatives or any
 other related or affiliated parties, and all such rights and remedies, whether arising under
 law, in equity, or otherwise, are hereby expressly reserved. This reservation specifically
 28 includes, but is not limited to, USG’s rights to challenge jurisdiction, venue, or other
 procedural and preliminary matters.

1 request to extend this deadline to February 28, 2025, as the parties require additional
 2 time to discuss potential resolution and are scheduled to participate in mediation during
 3 this time period. As such, the requested extension may obviate the need for motion
 4 practice and conserve judicial and the parties' resources.

5 The parties do not seek this extension for the purposes of delay and this is the first
 6 request for an of time for USG to respond to Kosmos's Complaint. Accordingly, the
 7 parties request that the Court grant USG an extension of time to respond to the Complaint
 8 (ECF No. 6) until February 28, 2025.

9 Dated: January 20, 2025.

10 PARSONS BEHLE & LATIMER

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18
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 20 dba The Kosmos Company

21 Attorneys for Defendant USG Nevada LLC

22 IT IS SO ORDERED.
 23

24 
 25 UNITED STATES MAGISTRATE JUDGE

26 DATED: January 21, 2025

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